

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA**

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Rosamond Kamara

Plaintiff

CIVIL

COMPLAINT

V.

Senator Tim Scott and the Team Scott Campaign

Defendants

Case No. 2:23-cv-4621-DCN-MGB

Jury Trial DEMANDED

Plaintiff for her complaint states and alleges as follows;

I. THE PARTIES

The Plaintiff:

Rosamond V. Kamara
2403 Mall Drive #7111; N. Charleston; SC 29406

The Defendants:

- (1) Senator Tim Scott
2500 City Hall Lane 3rd Floor N. Charleston SC 29406
- (2) The Team Scott Campaign
301 N. Main St. Suite 1006. Greenville, SC 29601

II. BASIS FOR JURISDICTION

This Court has jurisdiction. The venue lies properly in Charleston County, SC.

III. STATEMENT OF CLAIM

- A. The events that gave rise to Plaintiff Claim occurred while defendant is living in Charleston County, South Carolina.
- B. The events that gave rise to Plaintiff Claim occurred in May 2023.

C. FACTS

While Plaintiff was attending the Charleston School of Law and living at her apartment building of 2403 Mall Drive, North Charleston S.C., the defendants indulged in a venture of invading the plaintiff privacy in the most unimaginable way. After further enquiries, the plaintiff found out that senator Tim Scott invaded her privacy because the senator and his campaign team were looking for a suitable suitor for the senator. The Defendants had cameras and audio devices at the apartment of the plaintiff and her car.

The defendants had agents at the plaintiff apartment building and School invading the plaintiff's privacy. The defendants took it upon themselves to interfere in various of the plaintiff's personal affairs without plaintiff knowledge until May and after when the plaintiff found out of the defendant's conduct. The defendants had various vehicles stalking and following the plaintiff around. This apparently has been going on for months. Because the plaintiff was not living as fake and dishonest as the senator plus his team wanted her to be, at one point during their crusade, the defendants decided to label the plaintiff as mentally unstable up to conniving together with others to have plaintiff in a psych ward.

The defendants embarked on testing the plaintiff in the most outrageous ways. Apparently, this they were doing to make sure the plaintiff is good enough for the senator. They had the plaintiff in a survival mood for months. During this time, the plaintiff only knew that she was getting stalked, and her privacy was getting invaded, but

she never knew by who it was until May 2023. The plaintiff was living in an extremely fearful and painful reality as she was constantly scared for her life. Also, the senator sent agents to ask the plaintiff for her campaign ideas in an attempt to steal plaintiff's ideas because the senator and his campaign team believed that the plaintiff is supposedly a genius. At the psych ward, the doctors there were asking the plaintiff to write down her thoughts on paper. This the plaintiff believed was yet some other attempts to steal the plaintiff's ideas.

The plaintiff has suffered immensely by the defendants' actions and is asking the court to allow her to prove her case to a jury

D. COUNTS

1. INVASION OF PRIVACY

The defendants without authorization invaded the plaintiff's privacy by installing camera and listening devices at the plaintiff's apartment and her vehicle. The defendants then included others to meet and record the plaintiff's conversations. The defendants were sending agents to also manipulate the plaintiff asking for campaign ideas on how to get minority votes.

2. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

The defendants acted intentionally and recklessly in an extreme and outrageous way that threatens Plaintiff physical security and has caused Plaintiff severe emotional distress.

3. CRUEL AND UNUSUAL PUNISHMENT

The defendant's behavior is one for the books on intentional cruelty on the plaintiff while also misusing his political position by using it as a shield.

For months the defendants tortured the plaintiff thoroughly as they see fit without any remorse for the plaintiff and her daughter.

4. CYBER STALKING AND HARRASSMENT

The defendants stalked and harassed the plaintiff online to test her rigorously, judging her and causing her extreme anxiety whenever she goes online, and the defendants encouraged others to do the same.

5. DEFAMATION

The defendants' had agents online and at places where the plaintiff is a regular like at her School, while she was a student at the Charleston school of law and the political meetings that the plaintiff attends; these agents embarked on a mission to defamed the plaintiff's character so as when the

senator and his team finally succeeds to steal the plaintiff's ideas, they could have a shield to pin the plaintiff as mentally unstable.

IV. INJURY

- a. The defendants' conduct has caused the Plaintiff to suffer severe shame; embarrassment; and humiliation.
- b. The defendants' conduct has caused the Plaintiff to suffer severe emotional distress.
- c. The defendants' conduct has caused the Plaintiff to incur severe aggravated anxiety; depression; and ptsd.
- d. The Defendants' conduct has caused Plaintiff worrying about Plaintiff safety.
- e. The Defendants' conduct has ruined Plaintiff's reputation.
- f. The plaintiff has now incurred an aggravated lack of trust in others and lack of trust in the judicial system.
- g. Plaintiff has suffered many sleepless nights; panic attacks; and mental breakdowns.
- h. Defendants' conduct has caused Plaintiff Pain and Suffering.
- i. The defendants' conduct has caused Plaintiff to suffer unnecessary and preventable cruel and unusual punishment.

V. REQUEST FOR RELIEF

Wherefore, Plaintiff respectfully request that the Court:

1. Declare that Defendants' conduct, as set forth above, unlawful;
2. Enter judgement in Plaintiff's favor on her claims against Defendants in an amount exceeding \$50,000, the exact amount to be proven at trial;
3. Allow Plaintiff's damages to compensate her for the injuries she suffered as a result of Defendants' unlawful conduct;
4. Grant Plaintiff leave to amend the complaint to seek other damages.
5. Grant Plaintiff leave to amend the Complaint if the Court finds it deficient in any way;
6. Allow Plaintiff reasonable expenses incurred in this litigation, including attorney and expert fees;
7. Grant Plaintiff all other statutory relief to which she is entitled;
8. Grant any other relief the Court deems just and equitable.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. PRO SE LITIGANT

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 9/13/2023

Signature of Plaintiff: *Rosamond V. Kamara*

Printed Name of Plaintiff: Rosamond V. Kamara

